

SAVAD | CHURGIN
ATTORNEYS AT LAW

Paul Savad (1941-2020)
Joseph A. Churgin

55 OLD TURNPIKE ROAD – SUITE 209
(Rt. 59 & THRUWAY EXIT 14)
NANUET, NEW YORK 10954

Of Counsel
Susan Cooper
Donna Sobel

(845) 624-3820
Fax: (845) 624-3821

January 16, 2025

Hon. Magistrate Judge Miroslav Lovric
U.S. District Court Northern District Of New York
15 Henry Street
Binghamton, NY 13901

RE: Happy Hour Drinks Company, Inc. v. Can Man, LLC et al.
Case No. 3:24-cv-00047-TJM-ML

Your Honor:

The Plaintiff has moved to compel the production of Financial Documents, (Doc No. 59). Defendants have filed opposition (Doc No. 60). The Motion is scheduled to be argued on January 21, 2025, at 1 p.m. The attorneys for both sides respectfully request that the oral argument be conducted via virtual means in light of the predicted weather and the distance between both Counsel's offices and the Court.

Respectfully submitted,



JOSEPH A. CHURGIN
JAC/dk
cc: Eric Kurtz, Esq.
Happy Hour Drinks Company, Inc.